

EXHIBIT I

McDermott Will & Emery

Boston Brussels Chicago Düsseldorf Houston London Los Angeles Miami Munich
New York Orange County Rome San Diego Silicon Valley Washington, D.C.
Strategic alliance with MWE China Law Offices (Shanghai)

Joel E. Cohen
Attorney at Law
jcohen@mwe.com
212.547.5566

May 19, 2008

VIA HAND DELIVERY

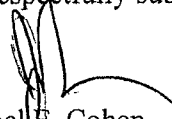
The Honorable Judge Ronald L. Ellis
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1970
New York, New York 10007

Re: Chen *et al.* v. Republic Restaurant Corp. *et. al.*
Index No. 07-Civ-3307

Dear Judge Ellis:

This firm represents the Defendants in the above-referenced matter. Defendants submit this letter as a supplement¹ to their May 16, 2008 letter (the "May 16th Letter") in light of receiving form letters from five more Plaintiffs (*i.e.*, Fen Z. Chen, Cong Dian Zheng, De Qing Lian, Zhu Kang Yong and Gong Yi Wang) requesting revised W-2s for 2005, 2006 and 2007.² (Attached hereto as Exhibit A are true and correct copies of the letters and the Certified Mail envelopes). As stated more fully in the May 16th Letter, the timing of Plaintiffs' requests creates questions about the veracity of their tax returns and demonstrates the compelling need to explore the Earned Income Tax Credit issues and Plaintiffs' credibility. Accordingly, Defendants respectfully request that this Court compel production of Plaintiffs' tax returns.

Respectfully submitted,



Joel E. Cohen

Enclosures

cc: Edward Sherwin, Esq. (w/encls.)
Ken Kimerling, Esq. (w/encls.)

¹ Defendants apologize for submitting a supplemental letter to the Court given Your Honor's stated concern at the last conference. However, Plaintiffs' credibility cannot be ignored given these circumstances.

² Again, these form letters are all written in English, despite the fact that these Plaintiffs all used interpreters at their depositions, and most of them testified that they could not speak, read or write English. See Deposition ("Dep.") of Fen Z. Chen 9:14-17, Dep. of Cong Dian Zheng 42:20 - 43:3, Dep. of Zhu Kang Yong 5:10-12, Dep. of Gong Yi Wang 5:5-10. (Attached hereto as Exhibit B are true and correct copies of the aforementioned deposition transcript excerpts).

EXHIBIT A

May 11, 2008

Me'Kong Delta, Inc.
37 Union Square West
New York, NY 10003

To Whom It May Concern:

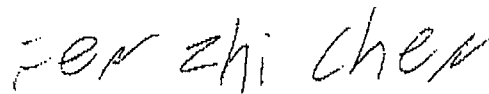
My name is Fen Zhi Chen, I work as a delivery person in your restaurant Me'Kong Delta, Inc. a/k/a Republic Restaurant.

I am writing to inform you that the 2005, 2006, and 2007 W2 forms you originally provided me is incorrect and does not reflect my true earnings. Please re-send me my W2 Forms to reflect the correct income during the time I worked at Me'Kong Delta Inc.

My mailing address is:

Attn: Fen Zhi Chen
536 52nd Street, #3
Brooklyn, NY 11220

Sincerely,

A handwritten signature in black ink that reads "Fen zhi chen". The signature is written in a cursive, slightly slanted style.

Fen Zhi Chen

NEW YORK NY 100

536 52 ST #3

BROOKLYN, N.Y. 11220

Handwritten signature

To:

ME'Kong Delta, INC
37 Union Square West
NEW YORK, N.Y. 10003

10003+3217 0045

10003+3217 0045

NEW YORK NY 100

536 52 ST #3

BROOKLYN, N.Y. 11220

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.
CERTIFIED MAIL



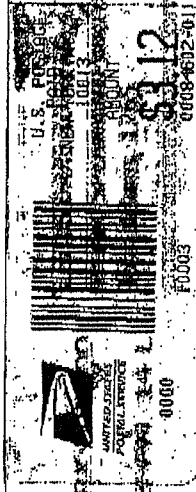
7007 3020 0002 8134 6504

10003+3217 0045

10003+3217 0045

To:

ME'Kong Delta, INC
37 Union Square West
NEW YORK, N.Y. 10003



NEW YORK NY 100

536 52 ST #3

BROOKLYN, N.Y. 11220

0000

10003+3217 0045

0000

10003+3217 0045

0000

10003+3217 0045

May 13, 2008

Me'Kong Delta, Inc.
37 Union Square West
New York, NY 10003

To Whom It May Concern:

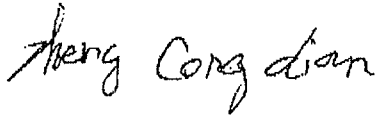
My name is Cong Dian Zheng, I work as a delivery person in your restaurant Me'Kong Delta, Inc. a/k/a Republic Restaurant.

I am writing to inform you that the 2005, 2006, and 2007 W2 forms you originally provided me is incorrect and does not reflect my true earnings. Please re-send me my W2 Forms to reflect the correct income during the time I worked at Me'Kong Delta Inc.

My mailing address is:

Attn: Cong Dian Zheng
417 60th Street, #3
Brooklyn, NY 11220

Sincerely,

A handwritten signature in black ink that reads "Zheng Cong dian". The signature is written in a cursive, flowing style.

Cong Dian Zheng

Cong DDAN 2/15/03

417 60ST #3

BROOKLYN, NY 11220

OF THE RETURN ADDRESS PROVIDED
CERTIFIED MAIL



7007 3020 0002 8134 6542



0000

10063



U.S. POST
PAID
NEW YORK, NY
MAY 18 2003
AMOUNT

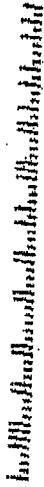
\$3.12
00061628

To: ME/Kong Delta INC

37 Union Square West

NEW YORK, N-Y 10003

10003333217 0045



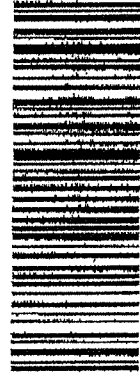
3

Cong RE w/nyg

140 ELbridge ST APT#11

NEW YORK, N-Y 10012

PLEASE SECURELY ATTACH TO ENVELOPE TO PREVENT
STATE RETURN ADDRESS FROM BEING LOST
CERTIFIED MAIL

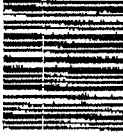


7007 3020 0002 8134 6535



0000

10003



U.S. POSTAGE
PAID
NEW YORK, NY
MAY 18 2003
AMOUNT

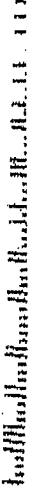
\$3.12
00061628-87

To: ME/Kong Delta INC

37 Union Square West

NEW YORK, N-Y 10003

10003333217 0045



May 13, 2008

Me'Kong Delta, Inc.
37 Union Square West
New York, NY 10003

To Whom It May Concern:

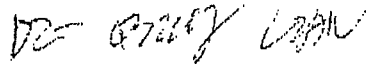
My name is De Qing Lian. I work as a delivery person in your restaurant Me'Kong Delta, Inc. a/k/a Republic Restaurant.

I am writing to inform you that the 2005, 2006, and 2007 W2 forms you originally provided me is incorrect and does not reflect my true earnings. Please re-send me my W2 Forms to reflect the correct income during the time I worked at Me'Kong Delta Inc.

My mailing address is:

Attn: De Qing Lian
163 Chrystie Street, #8
New York, NY 10002

Sincerely,

A handwritten signature in black ink, appearing to read "De Qing Lian".

De Qing Lian -

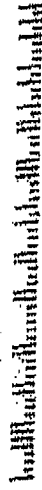
DE QING LEAN
163 Chrystle ST #8
NYC, NY 10002

7007 2680 0002 3391 9526



7007 2680 0002 3391 9526

10003+3217 0045



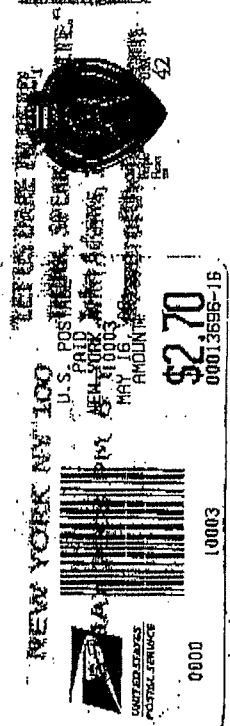
DE QING LEAN
163 Chrystle ST #8
NYC, NY 10002

7007 2680 0002 3391 9519



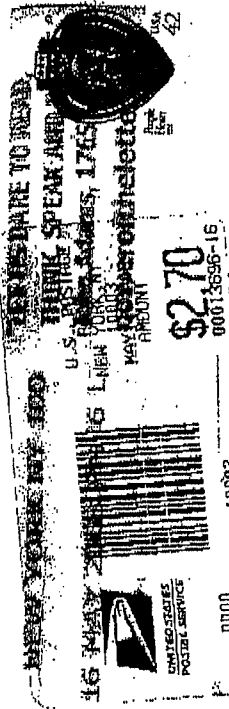
7007 2680 0002 3391 9519

10003+3217 0045



To: ME/Kong DELTA INC

37 Union Square West
NYC, NY 10003



To: ME/Kong Delta INC

37 Union Square West
NYC, NY 10003

May 13, 2008

Me'Kong Delta, Inc.
37 Union Square West
New York, NY 10003

To Whom It May Concern:

My name is Kang Yong Zhu, I work as a delivery person in your restaurant Me'Kong Delta, Inc. a/k/a Republic Restaurant.

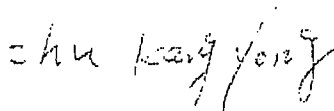
I am writing to inform you that the 2005, 2006, and 2007 W2 forms you originally provided me is incorrect and does not reflect my true earnings. Please re-send me my W2 Forms to reflect the correct income during the time I worked at Me'Kong Delta Inc.

My mailing address is:

Attn: Kang Yong Zhu
39 Bowery Street, #943
New York, NY 10002

Sincerely,

Kang Yong Zhu

A handwritten signature in black ink, appearing to read "Kang Yong Zhu" in a stylized, cursive script.

Kang Yong Zhu

39 BOWERY ST. AP7.943
New York. 10002

7007 3020 0002 8134 6498

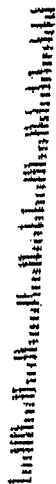
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLLOW THE ARROWS.

CERTIFIED MAIL



7007 3020 0002 8134 6498

1000313217 0045



MeKong Delta Inc.
37 Union Sq W.
NYC, NY 10003



0000

10003

U.S. POSTAGE
PAID
NEW YORK, NY
10003
MAY 16 08
AMOUNT

\$3.12

00013586-16

May 16, 2008

Me'Kong Delta, Inc
37 Union Square West
New York, NY 10003

To Whom It May Concern:

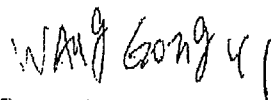
My name is Gong Yi Wang. I worked as a delivery person in your restaurant Me'Kong Delta, Inc. a/k/a Republic Restaurant.

I am writing to inform you that the 2005, 2006, and 2007 W2 forms you originally provided me is incorrect and does not reflect my true earnings. Please re-send me my W2 forms to reflect the correct income during the time I worked at Me'Kong Delta, Inc

My mailing address is:

Attn: Gong Yi Wang
140 Eldridge Street Apt #11
New York, N Y 10002

Sincerely,


Gong Yi Wang

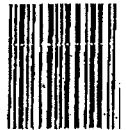
Gong Xi Wang
140 Eldridge ST Apt #11
NEW YORK, N-Y 10012

PLANT STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL



7007 3020 0002 8134 6535



0000

10003

To ME'Kong delta INC

37 union square v

NEW YORK, N-Y /

100033217 C045

